

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

Case No.: 1:22-cv-1032 (PKC) (JRC)

**DECLARATION IN SUPPORT**

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
GREGORY ELEFTERAKIS, ROMAN POLLAK,  
ANTHONY BRIDDA, IME COMPANIONS LLC,  
CLIENT EXAM SERVICES LLC, and IME  
MANAGEMENT & CONSULTING LLC,

Defendants.

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Emanuel Kataev, Esq. declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury,  
that the following is true and correct:

1. I am admitted to practice before this Court and am a member of Sage Legal LLC,  
who – together with Milman Labuda Law Group PLLC – are the attorneys for the Plaintiff IME  
WatchDog, Inc. (“IME WatchDog”) in this case.

2. As such, I am familiar with all the facts and circumstances heretofore had herein  
based upon my personal knowledge and a review of the file maintained by this office.

3. Throughout this case, Plaintiff has sought discovery from Defendants and various  
related third parties regarding Defendants’ contemptuous conduct in violation of this Court’s  
Orders. See copy of subpoenas and an affidavit of service annexed hereto as **Exhibit “A.”**

4. No response to these subpoenas were received.

5. I respectfully request that this Court grant the relief requested herein.

I declare under penalty of perjury that the foregoing is true and correct. Executed on  
October 9, 2024.

/s/ Emanuel Kataev, Esq.  
Emanuel Kataev, Esq.